



U.S. Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

June 8, 2023

The Honorable Sarah Netburn United States Magistrate Judge Southern District of New York 500 Pearl Street New York, New York 10007

Re: United States v. Yiyi Chen, a/k/a "Chiron," et al., 21 Mag. 3863

Dear Judge Netburn:

The Government writes to respectfully request that the complaint in the above-referenced case be unsealed in light of the arrest of certain of the defendants and their need to be presented in another district under Rule 5 of the Federal Rules of Criminal Procedure. A proposed order to that effect is attached.

Respectfully submitted,

DAMIAN WILLIAMS United States Attorney

By:

Alexander Li

Kevin Sullivan

Assistant United States Attorneys (212) 637-2265 / (347) 271-0355

Upon the application of the United States, by the United States Attorney for the Southern District of New York, Damian Williams, by Assistant United States Attorneys Alexander Li and Kevin Sullivan;

WHEREAS the complaint for defendants YIYI CHEN, a/k/a "Chiron," QINGZHOU WANG, a/k/a "Bruce," and FNU LNU, a/k/a "Er Yang," a/k/a "Anita" in the above-captioned case is currently sealed; and

WHEREAS the United States Attorney's Office has applied to have the complaint unsealed in light of the arrest of certain of the defendants and their need to be presented in another district under Rule 5 of the Federal Rules of Criminal Procedure; it is hereby

ORDERED that the complaint in this matter be unsealed for the reasons described in the preceding paragraph.

Dated: New York, New York June 8, 2023

HONORABLE SARAH NETBURN UNITED STATES MAGISTRATE JUDGE SOUTHERN DISTRICT OF NEW YORK